



May 31, 2024

Via ECF

Hon. Victoria Reznik
United States District Court
Southern District of New York
300 Quarropas St.
White Plains, NY 10601

Re: *Melville v. HOP Energy, LLC*, No. 21 Civ. 10406 (KMK) (VR)
Mullaney et al v. Hop Energy, LLC, No. 23 Civ. 7318 (KMK) (VR)

Dear Judge Reznik,

Counsel for Plaintiffs and the Proposed Classes and Defendant submit this joint status letter in accordance with the Court's April 12, 2024 Minute Entry.

On March 22, 2024, the parties agreed that Defendant would produce by April 12 all documents defense counsel had collected to date that were recalled by the parties' agreed-upon search terms, subject to a privilege clawback and subject to an initial privilege screen. March 22, 2024 Jt. Ltr., ECF 117. On May 7, Defendant completed its production of documents not captured by Defendant's initial privilege review.

Today, Defendant advised that its initial privilege review resulted in Defendant withholding approximately 82,100 documents from its productions. Defendant advised Plaintiff that it is conducting a linear manual privilege review of those 82,100 documents and committed to begin rolling productions of non-privileged documents and redacted versions of documents that contain both privileged and non-privileged information by June 7.

Plaintiffs asked that Defendant commit to completing its privilege review by a date certain. In response, Defendant advised that by June 13 it hopes to be able to commit to a date by which it will complete its productions.

Plaintiffs also requested that Defendant provide the list of search terms used to recall the approximately 82,100 documents withheld in Defendant's initial privilege screen. Defendant is considering that request and committed to providing its position by early next week.

The parties currently have another joint status letter due June 13.

Thank you for the Court's attention to this matter.

Respectfully submitted,

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